

# Child Protection Policy and Code of Conduct

## Qantas Cabin Crew Team Limited (ACN 664 428 997)

Effective Date: 25 June 2023

In this Policy, 'us' 'we' 'our' or 'QCCT' means Qantas Cabin Crew Team Limited (ACN 664 428 997) and its wholly owned subsidiaries from time to time, if any.

### 1. Statement of Purpose

- 1.1 This Policy presents the position taken by QCCT in respect of protecting children from abuse and exploitation.
- 1.2 By articulating common standards and approaches, this Policy aims to:
  - (a) create and maintain an organisational environment that is free of harassment and exploitation of children; and
  - (b) ensure the same in all of our work with the communities that we work with.
- 1.3 QCCT is committed to ensuring that any international activities it conducts are undertaken by QCCT, its Personnel, QCCT's donors and QCCT's donees having regard to protecting children from exploitation and abuse.

### 2. Scope

- 2.1 This Policy applies to:
  - (a) all Personnel;
  - (b) QCCT's donors; and
  - (c) QCCT's donees.

### 3. Definitions

In this Policy, unless the context clearly indicates otherwise:

Administration Manager means the person appointed to the QCCT Executive Committee with the responsibility for all of QCCT's administrative matters.

Board means the board of directors.

Chairperson means the chair of the Board and the QCCT Executive Committee.

Child exploitation and abuse (involves one or more of the following):

- (a) committing or coercing another person to commit an act or acts of abuse against a child;
- (b) possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material;
- (c) committing or coercing another person to commit an act or acts of grooming or online grooming; or

- (d) using a minor for profit, labour, sexual gratification, or some other personal or financial advantage.

Emotional abuse is a parent or caregiver's inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.

Grooming generally refers to behaviour that makes it easier for an offender to procure a child for sexual activity. It often involves the act of building the trust of children and/or their carers to gain access to children in order to sexually abuse them. For example, by encouraging romantic feelings or exposing the child to sexual concepts through pornography.

Neglect is the failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

Online grooming is the act of sending an electronic message with indecent content to a recipient who the sender believes to be under 18 years of age, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Personnel means all of our directors, officers, employees, agents, sub-contractors, volunteers, interns and participants (whether permanent, fixed-term or temporary), both in Australia and internationally.

Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

Policy means this Child Protection Policy and Code of Conduct.

Project Manager is the person appointed to manage QCCT's projects in any specific country.

QCCT Executive Committee means the executive committee of QCCT appointed from time to time, and includes (but is not limited to) the Chairperson, the Finance Manager and the Administration Manager.

QCCT Project Plans means a plan that the Project Manager designs and oversees operationally for any project that is supported by QCCT.

Sexual abuse is when a child or young person is used by an older or bigger child, adolescent or adult for his or her own sexual stimulation or gratification, or economic gain. Sexual abuse involves contact and non-contact activities which encompasses all forms of sexual activity involving children, including exposing children to pornographic images, or taking pornographic photographs of children.

#### 4. Awareness

- 4.1** QCCT will ensure that all Personnel are aware, and will use its reasonable endeavours to ensure all other people this Policy applies to are aware, of the problem of child abuse and the risks to children.
- 4.2** All Personnel will receive information relating to this Child Protection Policy and Code of Conduct during the induction process. Introduction to child protection issues will be provided as part of

QCCT's orientation program provided for all new Personnel. Further training will be conducted at a project and activity level, tailored to the needs of the relevant projects and activities, on specific areas of responsibility as appropriate on an annual basis.

- 4.3** QCCT has a planning, monitoring, evaluation and learning principles that includes child protection as an evaluation requirement which is contained in all QCCT Project Plans. QCCT's Project Plans should include child protection as part of the overall project evaluations.
- 4.4** QCCT will ensure that through awareness and personal and professional conduct, that Personnel and others minimise the risk to children.
- 4.5** QCCT adheres by strict guidelines in the recruiting process of new Personnel. The recruitment guidelines will be reviewed and updated regularly to ensure that they accurately reflect child safe recruiting and screening standards. The recruitment guidelines will include:
  - (a) a clear and bold statement that confirms QCCT's commitment to child protection in all advertising;
  - (b) 'best practice' recruitment and selection techniques with respect to children;
  - (c) include behaviour questions for interviews for positions which involve working with children;
  - (d) verbal reference checks as mandatory when the position involves working with children; and
  - (e) police checks where required and feasible.
- 4.6** Where appropriate, QCCT will conduct background and vetting checks on all Personnel, prior to their engagement, which may include (but is not limited to), criminal record checks, working with children and Blue Card (or equivalent) checks and Aviation Security Identification Card clearance, regardless of whether or not they work with children.
- 4.7** Where reasonably practicable and appropriate, QCCT will conduct background and vetting checks on all QCCT donors and QCCT donees, prior to any engagement or partnership with them, or donation or sponsorship to or from them (or the like), which may include (but is not limited to), criminal record checks, working with children and Blue Card (or equivalent) checks and Aviation Security Identification Card clearance, regardless of whether or not they work with children.
- 4.8** All Personnel and, to the extent reasonably practicable, all other people this Policy applies to will be expected to sign and adhere to a code of conduct for the protection of the child (refer to Annexure 1 of this Policy).
- 4.9** Pictures, images, or other likenesses of children and/or information related to children that could compromise their care and protection will not be made available through any form of communication media without proper protection and understanding of their use. Any images of

children should not be accompanied by detailed information relating to their place of residence. Images with corresponding text which may identify a child should be removed.

## 5. Reporting

**5.1** QCCT will ensure that Personnel and to the extent reasonably practicable, all other people this Policy applies are clear what steps to take where concerns arise regarding the safety of children.

### 5.2 Incident reporting

- (a) It is mandatory for any allegation, belief or suspicion of sexual or physical abuse (past or present) by a person to which this Policy applies to be reported immediately to the Project Manager, the Chairperson or the QCCT Executive Team, as appropriate. The Project Manager must notify the Chairperson and the QCCT Executive Team immediately, who will determine the appropriate reporting requirements, including to the donor and/or legal authorities, and record the report.
- (b) If a child reports an incident, the child must be taken seriously and listened to carefully. Once an allegation is made there should be an immediate response that protects the child from further potential abuse or victimisation. Where appropriate, the family of the child victim should be informed of the allegation and action proposed and they should be consulted where possible as to the process to be followed. This process will be steered and guided by the Project Manager, the Chairperson or the QCCT Executive Team (as applicable).
- (c) Each international project and QCCT partner will have a country specific child protection reporting procedure that takes into account the local context.

## 6. Incidents

**6.1** An incident should be documented immediately (within a period of 24 hours of the disclosure), the Project Manager, project co-ordinator or sponsorship manager as applicable, receiving the disclosure needs to have fully documented the allegation, including the time, place, witnesses. This report will possibly be used in court if charges are forthcoming.

**6.2** All reports should be submitted to the Project Manager with a copy to the Chairperson who together will recommend due process to be approved by the Board.

## 7. Report follow-up

Where any person has made a report and believes insufficient action has been taken, that person is encouraged to have initial follow-up with the Project Manager in the first instance. Should the person continue to believe that insufficient action has been taken, further follow up may also be directed to the Chairperson or the QCCT Executive Team. Alternatively, any person may report wrongdoings in accordance with the Complaints Handling Policy.

## 8. Responding

- 8.1 QCCT will ensure that action is taken to support and protect children where concerns arise regarding possible abuse.
- 8.2 The allegations should not be discussed or communicated to other people until such have been considered and a decision made by QCCT Executive Committee. The decision made should be documented and filed.
- 8.3 Confidentiality is crucial to a fair and effective reporting procedure. It is unacceptable and potentially defamatory for concerns of child abuse (and abusers) to be spread throughout the organisation rather than being directed through a formal complaints process. All participants must understand the importance of following the set reporting lines when concerns arise. Confidentiality protects the child, the notifier, the respondent and the organisation, and ensures a fair and proper process.
- 8.4 QCCT will not tolerate any form of coercion, intimidation, reprisal or retaliation against any employee who reports any form of abuse or exploitation, provides any information or other assistance in an investigation.
- 8.5 Professional counselling support will be made available to all parties involved.

## 9. Investigations

- 9.1 Physical and/or Sexual abuse of a child is a crime. QCCT will be required to notify authorities when there are reasonable grounds for reporting abuse.
- 9.2 Allegations made overseas must consider national legislation or internal procedures to investigate and address the allegations.
- 9.3 Internal investigations will be conducted by an independent third party to consider a confidential, thorough, impartial and prompt process. The investigation may consist of interviews with witnesses and others as appropriate, collection of information about the alleged conduct, gathering of documentation, or other procedures as appropriate. The individual alleged to have violated this Policy would have the opportunity to present his or her view of the events in question. Such independent third party will hold its determination until the investigation is completed.

## 10. International projects and activities

- 10.1 QCCT international projects must have the following:
  - (a) child-safe recruitment and screening processes, including but not limited to any or all of the following: criminal record checks prior to engagement, targeted interview questions and verbal referee checks, for all Personnel (including volunteers and interns) who will be working with children;
  - (b) a documented child protection complaints management procedure;
  - (c) regular provision of child protection training for relevant Personnel; and
  - (d) a child protection code of conduct that must be signed by all Personnel implementing.
- 10.2 QCCT funded activities in country:
  - (a) a documented policy compliance regime, including specified sanctions for breaches;

- (b) a reporting mechanism where the Project Manager is informed immediately in writing if any of the Personnel implementing QCCT funded activities is alleged to have committed, or been arrested for, or convicted of, criminal offences relating to child abuse or child pornography; and
- (c) child protection strategies incorporated into project risk management processes.

**11. Policy review**

**11.1** This Policy may be amended at any time by the Board in its absolute discretion.

**11.2** It is intended this Policy may be reviewed on an annual basis.

## Annexure 1 - Child Protection Code of Conduct

1. This Child Protection Code of Conduct (Code of Conduct) applies to all QCCT Personnel and to the extent reasonably practicable, all other people to which the Child Protection Policy and Code of Conduct applies, who will be requested to sign it. Any breach of the Code of Conduct will be seen as a serious concern and will result in disciplinary action. To the extent reasonably practicable and appropriate, in accordance with the Child Protection Policy and Code of Conduct, this Code of Conduct also applies to all other people to which the Child Protection Policy and Code of Conduct applies (Other Applicable Persons), who will also be requested to sign it.

2. All QCCT Personnel are responsible for encouraging, advocating and promoting the dissemination of the Code of Conduct. They also have a role in implementing, monitoring and enforcing its standards.

3. As one of the QCCT Personnel (or Other Applicable Persons), I commit myself to:

### Fairness

- (a) Treat all children fairly, and with respect and dignity, regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- (b) I will always seek to care for and protect the rights of children, and act in a manner that ensures that their best interests shall be the paramount consideration.

### Integrity

- (c) Uphold the integrity of QCCT, by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard.
- (d) I will demonstrate integrity, truthfulness, dedication and honesty in my actions. I will be patient, respectful and courteous to all persons with whom I deal in any capacity, including children.
- (e) I recognise that my personal conduct will reflect on QCCT's reputation and may impact on community perceptions, therefore I will refrain from inappropriate behaviour that may be compromising or detrimental to QCCT.
- (f) I understand that the onus is on me, as a person associated with QCCT, to avoid actions or behaviours that could be construed as child exploitation and abuse.

### Confidentiality

- (g) Safeguard and make responsible use of the information and resources to which I have access by reason of my membership with QCCT.
- (h) I will exercise due care in all matters of official business, and not divulge any confidential information about a child and other work-related matters in accordance with the staff regulations and rules and current guidelines.
- (i) I will protect, manage and utilise QCCT's human, financial and material resources appropriately. I will never use QCCT's resources to exploit or harass children or access child pornography. When photographing or filming a child for work-related purposes, I must:
  - (i) Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.

- (ii) Before photographing or filming a child, obtain consent from the child or parent or guardian of the child. As part of this, I must explain how the photograph or film will be used.
- (iii) Ensure photographs, films, videos and DVDS present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- (iv) Ensure images are honest representations of the context and the facts.
- (v) Ensure file labels, meta-data or text descriptions do not reveal identifying information about a child.

#### Prevent abuse of children

- (j) Prevent, oppose and combat all exploitation and abuse of the child.
- (k) I undertake not to abuse the power and influence that I have by virtue of my position over the life and well-being of a child.
- (l) I will report concerns or allegations of child exploitation and abuse by a QCCT staff member, consultant, volunteer, intern, partner, visitor or donor.
- (m) I will not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- (n) I will never request any service or favour from a child in return for protection or assistance. I will never engage in any exploitative relationships – sexual, emotional, financial or employment-related – with a child.
- (o) I will refrain from hiring children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury. I will report in writing on the nature and conditions of this employment to my Project Manager.
- (p) Wherever possible, I will ensure that another adult is present when working in the proximity of children.
- (q) I will not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.
- (r) I will not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my Project Manager's permission, and ensure that another adult is present if possible.
- (s) I will refrain from physical abuse of children.
- (t) I will not engage in behaviour to shame, humiliate, belittle or degrade a child or young person or otherwise emotionally or psychologically abuse a child or young person including exposing them to family violence.
- (u) I will not use any computers, mobile phones, video cameras, cameras or social media inappropriately, and will never exploit or harass children or access child exploitation material through any medium.



- (v) I will not inappropriately use social media to contact, access, solicit or befriend a child involved in QCCT programs or activities and misuse images of those children on personal social media sites (e.g. publishing them online).

Comply with laws

- (w) Refrain from any involvement in criminal or unethical activities, activities that contravene human rights, or activities that compromise the image and interests of QCCT.
- (x) I will neither support nor take part in any form of illegal, exploitative or abusive activities, including, for example, child labour, child pornography and trafficking of human beings and commodities.
- (y) I will not engage children under the age of 18 in any form of sexual activity or acts, including paying for sexual services or acts. This is regardless of the local age of consent, i.e. the local or national laws of the country in which I work. Ignorance or mistaken belief of the child's age is not a defence. Failure to report such a relationship may lead to disciplinary action.
- (z) I will comply with all relevant Australian and local legislation, including labour laws in relation to child labour.

**12. Disclosure**

I will immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with QCCT that relate to child exploitation and abuse.

**13. Acknowledgement**

I, \_\_\_\_\_ acknowledge that I have received, read and understand this Child Protection Code of Conduct and I agree to abide, uphold and promote appropriate risk based child protection standards at all times. I also understand that, if I am QCCT Personnel, any breach of this Child Protection Code of Conduct will result in disciplinary action or dismissal, in accordance with QCCT's disciplinary procedures.

(PRINT NAME)\_\_\_\_\_

(SIGNATURE)\_\_\_\_\_

(DATE)\_\_\_\_\_